

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

---

ASTELLAS INSTITUTE FOR REGENERATIVE )  
MEDICINE, )  
Plaintiffs, )  
v. ) C.A. NO. 1:17-cv-12239 ADB  
IMSTEM BIOTECHNOLOGY, INC., XIAOFANG )  
WANG, and REN-HE XU, )  
Defendants. )  
)

---

**ASSENTED-TO MOTION FOR NICOLA R. FELICE  
TO APPEAR *PRO HAC VICE***

Pursuant to L.R. 83.5.3(e)(2), the undersigned counsel for ImStem Biotechnology, Inc., Xiaofang Wang, and Ren-He Xu (collectively, “Defendants”), moves that Nicola R. Felice of Quinn Emanuel Urquhart & Sullivan, LLP be granted leave to appear *pro hac vice* on behalf of the Defendants. A declaration in support of this motion is attached hereto as Exhibit A.

Plaintiff Astellas Institute for Regenerative Medicine assents to the relief sought in this Motion.

Dated: March 18, 2021

Respectfully submitted,

IMSTEM BIOTECHNOLOGY, INC.;  
DR. XIAOFANG WANG; and  
DR. REN-HE XU

By their Attorneys,

/s/ Timothy R. Shannon

Timothy R. Shannon, MA Bar # 655325  
Martha C. Gaythwaite, MA Bar # 187650  
VERRILL DANA LLP  
One Portland Square  
Portland, Maine 04101  
(207) 774-4000  
tshannon@verrill-law.com  
mgaythwaite@verrill-law.com

Benjamin M. Stern, MA Bar # 646778  
VERRILL DANA LLP  
One Federal Street, 20<sup>th</sup> Floor  
Boston, Massachusetts 02110  
(617) 309-2600  
bstern@verrill-law.com

**LOCAL RULE 7.1 CERTIFICATION**

Pursuant to Local Rule 7.1(a)(2), I hereby certify that counsel for all parties conferred by telephone on March 18, 2021 and Plaintiff assents to this motion.

/s/ *Timothy R. Shannon*  
Timothy R. Shannon

**CERTIFICATE OF SERVICE**

I hereby certify that on March 18, 2021, I caused a true copy of the foregoing document to be served upon all counsel of record via the Court's CM/ECF electronic filing system.

Charles H. Sanders (via email; [Charles.Sanders@lw.com](mailto:Charles.Sanders@lw.com))  
LATHAM & WATKINS LLP  
John Hancock Tower, 27<sup>th</sup> Floor  
200 Clarendon Street  
Boston, MA 02116

Michael A. Morin (via email; [Michael.Morin@lw.com](mailto:Michael.Morin@lw.com))  
David P. Frazier (via email; [David.Frazier@lw.com](mailto:David.Frazier@lw.com))  
Rebecca L. Rabenstein (via email; [Rebecca.Rabenstein@lw.com](mailto:Rebecca.Rabenstein@lw.com))  
555 Eleventh Street, N.W., Ste. 1000  
Washington, DC 20004

/s/ *Timothy R. Shannon*  
Timothy R. Shannon

# EXHIBIT A

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

---

ASTELLAS INSTITUTE FOR REGENERATIVE )  
MEDICINE, )  
Plaintiffs, )  
v. ) C.A. NO. 1:17-cv-12239 ADB  
IMSTEM BIOTECHNOLOGY, INC., XIAOFANG )  
WANG, and REN-HE XU, )  
Defendants. )  
\_\_\_\_\_  
)

**DECLARATION OF NICOLA R. FELICE**

I, Nicola R. Felice, make the following declaration in support of the pending motion for leave to appear *pro hac vice* filed on my behalf.

1. I am an attorney at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, with an office at 51 Madison Avenue, 22<sup>nd</sup> floor, New York, New York 10010.

2. I have been admitted to practice in New York.

3. I am a member of the bar in good standing in every jurisdiction where I am admitted to practice.

4. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.

5. I have not previously had a *pro hac vice* admission to this court (or other admission for a limited purpose) revoked for misconduct.

6. I have read and agree to comply with the Local Rules of the United States District Court for the District of Massachusetts.

I declare under penalty of perjury that the foregoing is true and correct.

Date: March 17, 2021

*/s/ Nicola R. Felice*

Nicola R. Felice